

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA.

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D.C.

CASE NO: 00-6309-CF-SEITZ

ADDIX

BIST. CT.

S.D. FLA - MIA

UNITED STATES OF AMERICA,

Plaintiff,

-vs-

JULIUS BRUCE CHIUSANO,

Defendant.

MOTION FOR PERMISSION TO TRAVEL

COMES NOW, the Defendant, JULIUS BRUCE CHIUSANO, by and through undersigned counsel and pursuant to the Federal Rules of Criminal Procedure, and respectfully requests this Honorable Court enter an Order permitting the Defendant to leave the State of Florida and travel to Groton/New London, Connecticut and Tampa, Florida, and as grounds, would show unto the Court the following;

1. That the Defendant, JULIUS BRUCE CHIUSANO, is presently released on a one hundred thousand dollar corporate surety bond with supervised release.
2. That the Defendant is also released on bond on a one hundred thousand dollar corporate surety bond in Case No. 00-6273-Cr-Huck.
3. That the Defendant has been on supervised release since October 5, 2000.
4. That the Defendant respectfully requests this Honorable Court permit the Defendant to travel to Groton/New London, Connecticut and Tampa, Florida, for the purpose of attending the Super Bowl XXXV.
5. That the Defendant desires to travel outside of the State of Florida for approximately Three (3) days beginning on or about January 26, 2000 and returning January 28, 2001.
6. That a copy of the Defendant's Itinerary is attached hereto as Defendant's Exhibit 1.
7. That undersigned has spoken to the Pretrial Services officer, Raul Segaro, regarding this travel permit and he has no objection.
8. That the Defendant will provide addresses and telephone numbers where he will be

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staying to Rauol Segaro of the Pretrial Services Office in Dade County, Florida, as required under Defendant's terms and conditions of supervised release and report immediately upon his return to the jurisdiction.

WHEREFORE, by reason of the foregoing, the Defendant, JULIUS BRUCE CHIUSANO, respectfully requests this Honorable Court enter an Order granting the Defendant's request permitting the Defendant to travel outside the State of Florida and to Tampa, Florida.

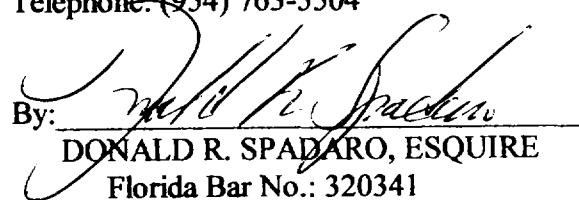
10-G CERTIFICATE

That undersigned counsel, pursuant to Local Rule 10(G)(1) certifies that he has contacted the opposing counsel, Assistant United States Attorney, Brian McCormick, of the Southern District of Florida in an effort of good faith to resolve by agreement the subject matter and he states that he has no objection to the granting of this motion.

I HEREBY CERTIFY that a copy of the foregoing has been furnished to Brian McCormick, Assistant United States Attorney, United States Attorney's Office, 299 East Broward Boulevard, Fort Lauderdale, FL 33301, by Facsimile (954-356-7230) and U.S. Mail Delivery; and the original hereof filed with the Clerk of the Court, by Hand Delivery, this 25th JANUARY, 2001.

Respectfully submitted,

DONALD R. SPADARO, P.A.
Attorneys for DEFENDANT/CHIUSANO
1000 South Federal Highway
Suite 103
Fort Lauderdale, Florida 33316
Telephone: (954) 763-5504

By: 
DONALD R. SPADARO, ESQUIRE
Florida Bar No.: 320341



FAX

CASINO JUNKETS

To: DON

Fax Number: 522-6888

From: JAY MAZEN LINDA KOZELL BOBBY CRISONINO

Date: 1-22-01

Page 1 of 1 Total:

RE: FOXWOOD RESORT

1/26-28/01

Remarks:

Itinerary (All times are local unless otherwise noted)

From	To	Departure date & time	Flight time	Arrival time	Parking location
FT LAUDERDALE	FT LAUDERDALE, FL	01/26/01 7:00 AM	0:17	7:17 AM	National Jets 800.525.0168
	FT LAUDERDALE-HOLLYWOOD INTL				
FT LAUDERDALE	GROTON/NEW LOND,	01/26/01 8:30 AM	2:29	10:59 AM	Columbia Air Service 860-449-1400
	GROTON-NEW LONDON				
GROTON/NEW	TAMPA, FL	01/28/01 12:00 PM	2:47	2:47 PM	Raytheon 800.323.0756
	TAMPA INTL				
TAMPA	FT LAUDERDALE, FL	01/27/01 11:19 PM	0:41	12:00 AM	National Jets 800.525.0168
	FT LAUDERDALE-HOLLYWOOD INTL				
FT LAUDERDALE	FT LAUDERDALE, FL	01/28/01 12:13 AM	0:17	12:30 AM	Alamo Jet, inc. 954-771-9511
	FT LAUDERDALE EXECUTIVE				